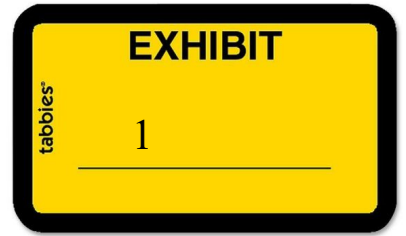


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION



DROP, INC.,

Plaintiff,

v.

DANIAL DANISH, DANIAL DANISH  
CONSULTANCY, INC., ERIK SUNDBERG,  
and AZMI CONSULTING, INC.,

Defendants.

Case No. 1:21-cv-02098

Honorable Rebecca R. Pallmeyer

**DEFENDANTS' FIRST SET OF EXPEDITED DOCUMENT REQUESTS**

Defendants Danial Danish, Danial Danish Consultancy, Inc., and Azmi Consulting, Inc. (collectively referred to as “Danish”), through their attorneys Trivedi & Khan, P.C., hereby request, pursuant to Federal Rule of Civil Procedure 34, and in accordance with the instructions contained herein, that Plaintiff Drop, Inc. answer the following document requests by July 23, 2021.

**DEFINITIONS AND INSTRUCTIONS**

1. “Drop,” “You,” and “Your” means Plaintiff Drop, Inc. and each of its officers, agents, representatives, and assigns.
2. “Danish” means Defendants Danial Danish, Danial Danish Consultancy, Inc., and Azmi Consulting, Inc. and each of their officers, agents, representatives, and assigns.
3. “Complaint” means Plaintiff’s Complaint filed in this action.
4. The term “document” shall have the broadest meaning possible under the Federal Rules of Civil Procedure and shall include, without limitation, all hard copies and all electronic, optical, and magnetic media such as e-mail, voicemail and computer files.

5. The term “relating to” means, without limitation, consisting of, referring to, reflecting, supporting, evidencing, contradicting, pertaining to, mentioning, memorializing, constituting, compromising, or being in any way legally, logically, or factually connected with the matter discussed, whether in whole or in part.

6. “Person” means any natural person, corporation, association, partnership, sole proprietorship, group, or any other individual or entity whether existing in law or in fact.

7. When reference is made to any Person, that reference shall be deemed to include anyone who has acted or is acting on that person’s behalf including, without limitation, any and all of that Person’s agents, employees, attorneys, officers, subsidiaries, affiliates, parents, predecessors, successors, representatives and/or assigns.

8. The conjunctions “and” and “or” each shall be interpreted as meaning “and/or” and shall not be interpreted to exclude any information or documents requested.

9. References to the singular shall include the plural and references to the plural shall include the singular.

10. With respect to any documents for which a privilege is being asserted, identify each such document by stating:

- a) The name, title and job or position of the document creator;
- b) The name, title and job or position of every person who received or saw the document or any of its copies;
- c) The date of the document;
- d) The physical description of any document including size, length, typed or handwritten, etc.;
- e) A brief description of the subject matter of the document;

- f) The basis for the privilege asserted; and
- g) The name, title and job or position of all persons on whose behalf the privilege is asserted.

11. If only a portion of an answer is subject to an assertion of privilege, provide answers that do not contain the allegedly privileged matter and state the basis for the privilege asserted with respect to the answer.

12. These document requests are deemed to be continuing requests. If, after producing answers to these document requests, Drop obtains additional responsive documents, Drop shall supplement the answers and provide such additional responsive documents to the undersigned counsel.

### **DOCUMENT REQUESTS**

1. All communications related to the development of RVM, IVR Technology, or Cost-Saving Technology.

**ANSWER:**

2. All documents related to any agreements between Drop and third-parties concerning the development of its Ringless Voicemail, IVR Technology, or Cost-Saving Technology.

**ANSWER:**

3. All documents Plaintiff intends to offer as exhibits at a preliminary injunction.

**ANSWER:**

4. All documents demonstrating or reflecting Drop's alleged trade secrets, including but not limited to computer codes, as described in the Complaint and in Drop's document produced to Danish's attorney on July 19, 2021.

**ANSWER:**

5. All documents, including but not limited to communications and agreements, with Richard Bolek or any companies affiliated with him related to RVM.

**ANSWER:**

Dated: July 21, 2021

Respectfully submitted,  
**DANIAL DANISH, DANIAL  
DANISH CONSULTANCY, INC.,  
and AZMI CONSULTING, INC.**

*/s/ Zubair A. Khan*

BY: One of their attorneys

Zubair A. Khan (6275265)  
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Chicago, IL 60661  
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**UNITED STATES DISTRICT COURT  
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Honorable Rebecca R. Pallmeyer

**NOTICE OF LIMITED DEPOSITION UNDER FEDERAL RULE OF CIVIL  
PROCEDURE 30(b)(6) IN PREPARATION FOR  
PRELIMINARY INJUNCTION HEARING**

TO: Jacob D. Koering, as counsel for Plaintiff Drop, Inc.  
MILLER, CANFIELD, PADDOCK AND STONE, PLC  
225 West Washington Street, Suite 2600  
Chicago, IL 60606

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 30(b)(6) and in accordance with the Court's direction at the July 7, 2021 status conference and again on July 20, 2021, Defendant Danial Danish ("Danish"), by and through its attorneys, Trivedi & Khan P.C., will take the deposition(s) of Defendant Drop, Inc. ("Drop") at the offices of Trivedi & Khan P.C., 300 N. Martingale Road, Suite 725, Schaumburg, Illinois. The deposition(s) are hereby scheduled to begin at 1:00 p.m. on July 27, 2021 and continue from day to day until concluded. Plaintiff is required to designate one or more officers, directors, managing agents, or other persons most knowledgeable to testify on behalf of the organization about:

1. the business operations of Drop, Inc., including, but not limited to, any operations, services, or consulting relating to Ringless Voicemail (RVM) and Interactive Voice Response (IVR) ;
2. any computer code, systems, and functionality relating to RVM, IVR, or both (the “Relevant Code”) that Drop, Inc. has previously or does currently use, provide services with respect to, evaluate, or access (or had access to, whether such access was actually utilized), including but not limited to as a result of any relationship with the Defendants, Richard Bolek, and any other persons or entities, specifically but without limitation including:
  - a. identifying all Relevant Code, including where it is located, and who has access to it;
  - b. identifying all persons, entities, servers, repositories, devices, media, etc., to whom Relevant Code was transferred or delivered or where Relevant Code was stored, tested, modified, or deployed, including their relationship to Danish Consultancy and the other Defendants;
  - c. the functionality, content, processes, and structure of all Relevant Code;
  - d. information relevant to the development of Relevant Code, including but not limited to all persons and entities (including but not limited to programmers, developers, third party service providers, customers, clients, etc.) involved in the conceptualization, development, testing, or deployment of Relevant Code, all version information and modifications made, and dates when Relevant Code and particular functionality was developed or modified;

- e. all contracts, invoices, and related documents; and
  - f. all communications;
- 3. Records and information relating to any business operations arising out of or relating to RVM, IVR, Relevant Code, or any combination of them, regardless of whether such records relate to business operations of Drop, Inc. itself, those of any person or entity who is a customer, client, or affiliate of Drop, Inc., or any third party provider used by any of the foregoing, including but not limited to telecommunication minutes usage and purchase, volume data, amounts invoiced, payments made or received, identifying third party providers of products or services utilized and their role, proposals to provide products or services, agreements to provide products or services, business terms, services rendered, and other details;
- 4. All information contained in the document provided by Drop on July 19, 2021;
- 5. Any and all actions taken to store and protect the confidentiality of Drop's alleged trade secrets;
- 6. the creation, maintenance, and storage of all documents related to all items identified above, including, but not limited to:
  - a. any and all systems on which such documents are created, stored, and maintained;
  - b. any processes or procedures in place for the creation, storage, and maintenance of such documents;

- c. access and activity logs demonstrating the persons or entities with the ability to, or which have, accessed those documents; and
- d. any document retention policies.

The deponent, the court reporter, and counsel for the parties will participate in the deposition. The deposition will continue from day-to-day until completed and will be stenographically recorded. The deposition may also be videotaped.

You are invited to attend and participate as provided by the Federal Rules of Civil Procedure.

Respectfully submitted,

Dated: July 21, 2021

/s/ Zubair A. Khan  
Zubair A. Khan  
Trivedi & Khan P.C.  
300 N. Martingale Road, Suite 725  
Schaumburg, IL 60173  
Phone: (224) 353-6346  
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Email: service@trivedikhan.com  
*Attorneys for Defendants Danial Danish,  
Danial Danish Consultancy, Inc., and Azmi  
Consulting, Inc.*



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Limited Deposition Under Federal Rule of Civil Procedure 30(b)(6) in Preparation for Preliminary Injunction Hearing was served upon:

Jacob D. Koering  
MILLER, CANFIELD, PADDOCK AND  
STONE, PLC  
*Counsel for Drop, Inc.*  
225 West Washington Street, Suite 2600  
Chicago, Illinois 60606  
Email: [koering@millercanfield.com](mailto:koering@millercanfield.com)

David Adler  
Adler Law Group  
*Counsel for Erik Sundberg*  
300 Saunders Road, Suite 100  
Riverwoods, Illinois 60015  
Email: [David@adler-law.com](mailto:David@adler-law.com)

by email and on the 21<sup>st</sup> day of July, 2021.

/s/Jessica R. Howell  
Jessica R. Howell

[X] Under penalties as provided by law pursuant to Ill.Rev.Stat., Ch. 110, Sec. 1-109, I certify that the statements set forth herein are true and correct.